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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 SNOW COVERED CAPITAL, LLC,
14 Plaintiff,
15 v.
16 WILLIAM WEIDNER, *et al.*,
17 Defendants.

Case No.: 2:19-cv-00595-APGNJK

**STIPULATION AND ORDER TO
EXTEND REMAINING DEADLINES
REGARDING PRE-FORECLOSURE
DAMAGES [ECF 361]**

(SECOND REQUEST)

18
19 AND ALL RELATED MATTERS.
20

21 Plaintiff Snow Covered Capital, LLC (“**SCC**”), Defendant William Weidner (“**Mr.**
22 **Weidner**”), and the Estate of Andrew Fonfa (collectively, the “**Parties**”) hereby submit this
23 Stipulation to Extend the Remaining Deadlines Regarding Pre-Foreclosure Damages and request
24 this Court enter an order providing an additional seven-day extension of the requested deadlines
25 originally set forth in the Court’s December 7, 2023 Minute Order (ECF No. 361).

26 On December 7, 2023, this court entered an order setting forth, *inter alia*, five deadlines to
27 address the issue of pre-foreclosure damages:

- 1 (1) By December 27, 2023, Defendants are to respond to SCC's pre-foreclosure damage
2 claims in writing;
- 3 (2) By January 3, 2024, the Parties are to meet and confer about the pre-foreclosure
4 damages issues;
- 5 (3) By January 10, 2024, the Parties are to file a stipulation enumerating what agreements
6 have been reached and what remains in dispute;
- 7 (4) By January 17, 2024, the Parties are to file cross-briefs on the issue of pre-foreclosure
8 damages; and
- 9 (5) By January 31, 2024, the Parties are to file responsive briefs on the issue of pre-
10 foreclosure damages.

11 ECF No. 361.

12 On December 22, 2023, the Parties submitted a Stipulation and Order to Extend Remaining
13 Deadlines Regarding Pre-Foreclosure Damages (First Request), requesting this Court extend four
14 of the five remaining pre-foreclosure damages by seven days. ECF No. 369. The Court
15 subsequently granted the seven-day extension request. ECF No. 375.

16 The Parties are requesting an additional seven-day extension to these deadlines. This is
17 the second request for an extension of the deadlines set forth herein.¹

18 Good cause exists for the additional seven-day extension as Mr. Weidner's counsel has
19 been working diligently to review SCC's list of pre-foreclosure damage claims ("***Pre-foreclosure***
20 ***damages***"), which were provided by SCC on December 13, 2023. On December 20, 2023, Mr.
21 Weidner's counsel requested additional information to assist in the review of the pre-foreclosure
22 damages and to extend the remaining deadlines by one week. SCC's counsel agreed to provide
23 the additional information and to the extension. SCC's is continuing to work on providing the
24 additional information requested and has agreed to an additional seven-day extension. An

25
26 ¹ The Parties omitted the January 31, 2024, deadline to file responsive briefs on the issue of pre-
27 foreclosure damages in their first request for an extension of the pre-foreclosure damages issue
deadlines. As such, this is the Parties' first request to extend the January 31, 2024, deadline.


additional seven-day extension will provide Mr. Weidner's counsel adequate time to meaningfully review the additional information once provided by SCC.

Further, good cause exists for the requested extensions in light of the holidays that limited the Parties' availability to review the pre-foreclosure damages and ability to meet and confer on this issue. Accordingly, the Parties respectfully request that this Court enter an order extending the deadlines related to the pre-foreclosure damages by seven-days as follows:

| Task | Current Deadline | Proposed New Deadline |
|---|--------------------------------|--------------------------------|
| Defendants' written response to SCC's pre-foreclosure damage claims. | January 3, 2024 by 5:00 PM | January 10, 2024 by 5:00 PM |
| The Parties are to meet and confer about the pre-foreclosure damages issue. | January 10, 2024 | January 17, 2024 |
| A stipulation enumerating what agreements have been reached and what remains in dispute is to be filed. | January 17, 2024 by 5:00 PM | January 24, 2024 by 5:00 PM |
| The Parties are to file cross-briefs on the pre-foreclosure damages issue. | January 24, 2024 by 5:00 PM | January 31, 2024 by 5:00 PM |
| The Parties are to file responsive briefs on the pre-foreclosure damages issue. | January 31, 2024 by 5:00 PM | February 7, 2024 by 5:00 PM |

IT IS SO STIPULATED.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: January 8, 2024

1 DATED this 5th day of January 2024.

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DATED this 5th day of January 2024.

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DATED this 5th day of January 2024.

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